

DECLARATION OF JENNIFER LIESER

I, Jennifer Lieser, declare as follows:

1. I represent Donna Heinel in the case of *United States v. Heinel*, Case No. 1:19-cr-10081-IT-2.

2. On February 1, 2022, my partner, Nina Marino, and I engaged in an attorney proffer with AUSAs Leslie Wright and Ian Stearns with the United States Attorney's Office for the District of Boston. The below represents a summary of what was discussed based on recollections and notes. It is not meant to be a verbatim account of what was discussed.

3. Heinel had knowledge of Jovan Vavic's dynamics with multiple USC coaches across the baseball, basketball, tennis, volleyball, rowing, and soccer teams. It is understood that she knew the coaches and Vavic used Rick Singer to bring walk-ons onto the team whose parents were wealthy in order to receive donations onto their gift accounts.

4. In regards to the knowledge of falsity in water polo profiles presented to subco, around 2014, Tim Brunold discussed at a subco meeting that he was made aware that subco was being "duped" by certain coaches.

5. Unidentified department personnel cross-referenced the listed level of scholarship when the student-athlete came to subco and what the actual percentage listed on the NLI was when it was sent by Compliance. Between 10 to 12 student-athletes had different percentages. Of the student-athletes on this list, the water

1 polo team had the majority. Heinel subsequently checked the resumes for several
2 of Vavic's recruits and noticed inaccuracies.

3 6. Casey Moon was the person that made these resumes and "took the fall" for
4 the inaccuracies.
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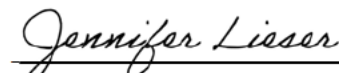
6 7. A particular student's resume appears to be falsified based on what was
7 written in the resume when compared to what was reported on the USC water polo
8 website.
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10 8. Vavic may have lied about a female water polo player whom Heinel
11 presented in subco. The biography stated her proficiency in the sport, but her essay
12 in her application stated that she had a [REDACTED] and could no longer play
13 water polo.
14

15 9. Each resume that Casey Moon falsified appeared to be similar based on the
16 amount and types of accolades and awards listed.
17

18 I declare under penalty of perjury under the laws of the United States that
19 the foregoing is true and correct to the best of my recollection.
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21 I executed this declaration on November 3, 2025, in Los Angeles, California.
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26 JENNIFER LIESER
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